

EXHIBIT 65



1 testified to. And I'd appreciate it, Ellen, if
2 you didn't characterize his testimony --

3 MS. NOTEWARE: He can disagree. I'm
4 asking him a question.

5 A. Could you just ask the question again?
6 I'm sorry.

7 Q. I'll ask a different one.

8 You seem to be talking today about one
9 incident involving one interaction, but your email
10 to Mr. Schmill is about a practice. And I'm
11 trying to understand what you mean by a practice.

12 And if you could explain that to me, I
13 would appreciate it.

14 A. I can't go back in history and tell you
15 everything that was going through my head when I
16 wrote this.

17 What we were trying to do is figure out a
18 way to tell The Globe that we don't have
19 preferences for legacies or donors, when Stu and I
20 knew full well that we had one example in the
21 recent past where that was not the case.

22 And that's what we were fighting with here
23 because -- and we were not happy about being put
24 in this situation.

1 and thousands of admits, out of 150,000 alumni,
2 and thousands and thousands of donors.

3 So you would not find statistically
4 significant impact. And I'm not sure that's a
5 winning argument with The Boston Globe. But the
6 fact is it's saying that there is essentially no
7 impact on one's odds of admission because of
8 donors.

9 I don't know if I'm -- anyway.

10 Q. I understand what you're saying. You're
11 referring to the fact that two people were
12 admitted as a result of pressure is not
13 statistically significant. That's what you're
14 saying?

15 A. Correct.

16 Q. And you were aware of the two -- [REDACTED]
17 being admitted as a result of the pressure from
18 the chairman of MIT on the director of admissions
19 because the director of admissions reported it to
20 you sometime after that happened. Correct?

21 MR. RYBNICEK: Objection to form.

22 A. It is correct that it was reported to me
23 sometime after it happened.

24 Q. Okay. And it's possible that there could